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Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

IRMA CASILLAS DE MAGANA,

Plaintiff,

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KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

No. 1:21-cv-01288-BAK (EPG)

STIPULATED MOTION AND ORDER FOR
AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

(ECF No. 16)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's Motion for Summary Judgment be extended sixty-five days (65) days from August 8, 2022, to October 12, 2022. This is Defendant's first request for an extension. Counsel for Plaintiff has no objection to Defendant's request for an extension.

Good cause exists for this request. Defendant respectfully requests this additional time because Counsel for Defendant has and will be unable to devote the time required to complete Defendant's response to Plaintiff's Motion for Summary Judgment given the current due date.

1 Counsel for Defendant has been out of the office sick with COVID. Counsel for Defendant also
2 has been and will continue to need to provide care for his son and daughter who also have
3 COVID and are currently unable to attend school or otherwise be cared for by another party. In
4 addition, unscheduled sick leave and scheduled leave have resulted in increased workload and
5 competing deadlines. Counsel for Defendant currently has fourteen (14) merit briefs currently
6 due in district court cases over the next 30 days. Given this current situation and upcoming
7 scheduled leave in August (if even able to attend), an extension until October 12, 2022 should
8 provide an opportunity for the undersigned Counsel for Defendant to complete the response to
9 Plaintiff's Motion for Summary Judgment. Furthermore, a reassignment of this matter to another
10 staff attorney is currently not tenable given the high volume of cases that all of our limited staff
11 (due to leave and resignations) is handling. Counsel apologizes to the Court for any
12 inconvenience caused by this delay. All other dates in the Court's Scheduling Order shall be
13 extended accordingly.

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15 Respectfully submitted,

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PHILLIP A. TALBERT
United States Attorney

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DATE: July 25, 2022

18 By: s/ Oscar Gonzalez de Llano
OSCAR GONZALEZ DE LLANO
19 Special Assistant United States Attorney
Attorneys for Defendant

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Respectfully submitted,

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Attorneys for Plaintiff

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DATE: July 25, 2022

By: s/ Jonathan O. Pena*
Jonathan O. Pena, Esq.
24 Pena & Bromberg, Attorneys at Law
(*as authorized by email)

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ORDER

Pursuant to Defendant's stipulated motion (ECF No. 16), IT IS ORDERED that Defendant shall have an extension, up to and including October 12, 2022, to respond to Plaintiff's motion for summary judgment. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: July 26, 2022

/s/ Eric P. Groj
UNITED STATES MAGISTRATE JUDGE